IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

Luminati Networks Ltd.,

Plaintiff,

v.

Code200, UAB, Oxysales, UAB, and Metacluster LT, UAB,

Defendants.

Civil Action No. 2:19-cv-00396-JRG

JOINT MOTION TO AMEND DOCKET CONTROL ORDER TO EXTEND BURDEN EXPERT REPORT DEADLINE BY ONE BUSINESS DAY

Plaintiff Luminati Networks Ltd. and Defendants Code200, UAB, Oxysales, UAB, and Metacluster LT, UAB (collectively, the "Parties") respectfully request a one business day extension of time—i.e., from Friday, February 26 to Monday, March 1, 2021—to submit their burden expert reports. In support thereof, the Parties state that the additional time will provide the parties time to incorporate the Court's claim construction ruling into the relevant reports and that the parties' counsel have been filing summary judgment, *Daubert*, and pre-trial materials in the copending *Teso* case, thus necessitating the requested short extension. The Parties also state that attorneys working on this matter residing in Texas had their ability to work last week adversely affected by the recent storms. Further, no other deadlines will be affected by the requested extension. All Parties join in the instant motion. The Parties have submitted a proposed Docket Control Order herewith for the Court's consideration.

Dated: February 25, 2021 Respectfully submitted,

s/Robert Harkins

J. MARK MANN
Texas State Bar No. 12926150
mark@themannfirm.com
G. BLAKE THOMPSON
Texas State Bar No. 24042033
blake@themannfirm.com
MANN | TINDEL | THOMPSON
300 West Main Street
Henderson, Texas 75652

Telephone: (903) 657-8540 Telecopier: (903) 657-6003

KORULA T. CHERIAN sunnyc@ruyakcherian.com
ROBERT HARKINS
bobh@ruyakcherian.com
RUYAKCHERIAN LLP
1936 University Avenue, Suite 350
Berkeley, California 94702
Telephone: (510) 944-0192

RONALD WIELKOPOLSKI ronw@ruyakcherian.com RUYAKCHERIAN LLP 1901 L Street, NW, Suite 700 Washington, DC 20036 Telephone: (202) 838-1560

S. CALVIN CAPSHAW
Texas State Bar No. 03783900
ccapshaw@capshawlaw.com
ELIZABETH L. DERIEUX
Texas State Bar No. 05770585
ederieux@capshawlaw.com
CAPSHAW DERIEUX, LLP
114 E. Commerce Avenue
Gladewater, Texas 75647

Telephone: (903) 845-5770

Counsel for Luminati Networks, Ltd.

Dated: February 25, 2021 Respectfully submitted,

s/Steven Callahan

MICHAEL C. SMITH
Texas State Bar No. 18650410
michaelsmith@siebman.com

SIEBMAN, FORREST, BURG & SMITH LLP

113 East Austin Street Marshall, Texas 75671 Telephone: (903) 938-8900 Telecopier: (972) 767-4620

STEVEN CALLAHAN

Texas State Bar No. 24053122 scallahan@ccrglaw.com

CRAIG TOLLIVER

Texas State Bar No. 24028049 ctolliver@ccrglaw.com

GEORGE T. "JORDE" SCOTT

Texas State Bar No. 24061276

jscott@ccrglaw.com

MITCHELL SIBLEY

Texas State Bar No. 24073097 msibley@ccrglaw.com

CHARHON CALLAHAN

ROBSON & GARZA, PLLC

3333 Lee Parkway, Suite 460

Dallas, Texas 75219

Telephone: (214) 521-6400 Telecopier: (214) 764-8392

Counsel for Defendants Code200, UAB, Oxysales, UAB, and Metacluster LT, UAB

CERTIFICATE OF CONFERENCE

The undersigned certifies that, on February 25, 2021, he met and conferred with Luminati's counsel and Luminati has advised that it joins this motion and agrees to the relief requested herein.

s/Steven Callahan
STEVEN CALLAHAN

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a) on February 25, 2021. As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A).

s/Steven Callahan
STEVEN CALLAHAN